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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION – LOS ANGELES**

Frankel, et al.,

Plaintiffs,

v.

Regents of the University of  
California, et al.,

Defendants.

Case No. 2:24-CV-4702-MCS

**PARTIES' STIPULATION  
PERMITTING ADDITIONAL  
BRIEFING ON DOJ STATEMENT OF  
INTEREST**

**[PROPOSED] ORDER AND  
SUPPORTIVE DECLARATION  
FILED CURRENTLY HEREWITH**

Judge: Hon. Mark C. Scarsi  
Courtroom: 7C

PARTIES' STIPULATION PERMITTING  
ADDITIONAL BRIEFING ON DOJ  
STATEMENT OF INTEREST  
CASE NO. 2:24-CV-4702-MCS

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**TO THE COURT:**

Plaintiffs Yitzchok Frankel; Joshua Ghayoum; Eden Shemuelian; and Dr. Kamran Shamsa (“Plaintiffs”) and Defendants Michael V. Drake; Gene D. Block; Darnell Hunt; Michael Beck; Monroe Gorden, Jr.; Rick Braziel; Julio Frenk (by automatic substitution); and Steve Lurie (by automatic substitution) (“Defendants”) (collectively, the “Parties”) hereby submit the following Stipulation Permitting Additional Briefing on the United States Department of Justice’s Statement of Interest.

WHEREAS, on March 17, 2025, the United States Department of Justice filed a Statement of Interest (ECF No. 139) (the “Statement”) relating to Defendants’ Motion for Judgment on the Pleadings (ECF No. 108) (the “Motion”).

WHEREAS, the hearing on the Motion is noticed for March 31, 2025, and briefing on the Motion has concluded.

WHEREAS, on March 20, 2025, the Parties met and conferred and agreed that both Plaintiffs and Defendants would benefit from additional briefing in response to the Statement. Cowan Decl. ¶ 4.

WHEREAS, the Parties further agreed that it is in the interests of judicial economy to avoid the *ex parte* application process. Cowan Decl. ¶ 5.

WHEREAS, the Parties further agreed that Defendants would file a response to the Statement by March 24, 2025, and Plaintiffs would file a response to Defendants’ response by March 27, 2025, each limited to 1,500 words. Cowan Decl. ¶ 6.

WHEREAS, good cause exists to permit the Parties to file responses to the Statement prior to the March 31 hearing so that they may address the substantive legal arguments raised in the Statement, which are germane to the Court’s consideration of the Motion.

1           **THEREFORE, IT IS HEREBY STIPULATED**, by and between the  
2 Parties, that:

3           Defendants will file a response to the Statement by March 24, 2025, and  
4 Plaintiffs will file a response to Defendants' response by March 27, 2025, each  
5 limited to 1,500 words.

6  
7 Dated: March 20, 2025

Respectfully submitted,

8 By: /s/ Matthew R. Cowan  
9 MATTHEW R. COWAN  
10 *Attorney for Defendants Michael V.*  
11 *Drake; Gene D. Block; Darnell Hunt;*  
12 *Michael Beck; Monroe Gorden, Jr.;*  
13 *Rick Braziel; Julio Frenk (by automatic*  
14 *substitution); and Steve Lurie (by*  
15 *automatic substitution)*

16 /s/ Mark L. Rienzi  
17 MARK L. RIENZI  
18 *Attorney for Plaintiffs Yitzchok*  
19 *Frankel; Joshua Ghayoum; Eden*  
20 *Shemuelian; and Dr. Kamran Shamsa*

**SIGNATURE ATTESTATION**

Pursuant to Local Rule 5-4.3.4, I hereby attest that the other signature listed, on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: March 20, 2025

Respectfully submitted,

By: /s/ Matthew R. Cowan

MATTHEW R. COWAN

*Attorney for Defendants Michael V. Drake; Gene D. Block; Darnell Hunt; Michael Beck; Monroe Gorden, Jr.; Rick Braziel; Julio Frenk (by automatic substitution); and Steve Lurie (by automatic substitution)*